

to formulate an appropriate response, which would be difficult to effectively accomplish during the four business days currently permitted for Defendants' response.

Accordingly, in order to effectively prepare an appropriate response to Plaintiffs' filing and to allow sufficient time for coordination with the relevant agencies within DHS, Defendants respectfully request, without opposition by Plaintiffs, that Defendants' deadline for responding be extended by seven additional days, until June 3, 2015.

Dated: May 21, 2015

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Respectfully submitted,

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Counsel for Defendants

CERTIFICATE OF CONFERRAL

Pursuant to Local Civil Rule 7.1.D, undersigned counsel hereby certifies that counsel for Plaintiffs, Angela Colmenero, was contacted regarding Plaintiffs' position on the foregoing Motion for Extension of Time, and indicated that Plaintiffs do not oppose the relief sought in this Motion.

/s/ Daniel Schwei
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Unopposed Motion for Extension of Time to Respond to Plaintiffs' Filing has been delivered electronically on May 21, 2015, to counsel of record via the District's ECF system.

/s/ Daniel Schwei
Counsel for Defendants